IN THE UNITED STATES ARMY FIRST JUDICIAL CIRCUIT

UNITED STATES)	
v.)	STIPULATION OF EXPECTED TESTIMONY
MANNING, Bradley E., PFC)	FORT LEAVENWORTH WITNESS
U.S. Army, xxx-xx(b)	
Headquarters and Headquarters Company, U.S.	0-6
Army Garrison, Joint Base Myer-Henderson Hall,)	DATED: 25 February 2013
Fort Myer, VA 22211	

It is hereby agreed by the Accused, Defense Counsel, and Trial Counsel, that if Fort Leavenworth witness were present to testify during the merits and the pre-sentencing phase of this court-martial, he would testify substantially as follows.

- 1. I am a Security Specialist at the Center for Army Lessons Learned (CALL), U.S. Army Combined Arms Center, Fort Leavenworth, Kansas. I have worked for CALL for the past 9 years and 11 months. Recently, I was moved to the CALL Intelligence Warfighting Team. My job title and duties have not yet been finalized for my new position.
- 2. CALL is an agent for change focused on the collection, analysis, dissemination, integration, and archiving of new concepts; tactics, techniques, and procedures (TTP); and solutions throughout the Army from the tactical through theater/strategic levels of war. CALL is forward deployed around the globe and provides joint, interagency, intergovernmental, and multinational (JIIM) forces with historic and emerging observations, insights, and lessons (OIL). The support provides valuable TTP to deployed and follow-on forces and helps improve the warfighting capabilities of the Army. CALL is a multi-media based operation that disseminates these lessons and other related materials through a variety of print and electronic media, including our website.
- 3. As a former Security Specialist for CALL, one of my responsibilities was to assist CALL as a member of a team to put out rapid adaption information to the field. Rapid adaption is a process whereby information is analyzed and disseminated in a timely manner relative to the criticality of actions required for soldiers and leaders to adapt that information to current operations and doctrine, organization, training, material, leadership & education, personnel, and facilities (DOTMLPF) development. The rapid adaption process is designed to save soldier's lives and improve the effectiveness and efficiency of Army operations.
- 4. On 9 May 2011, CPT Joshua Tooman sent a Request for Information (RFI) to CALL. CALL operations department subsequently sent the RFI to me. I looked to see if CALL had produced anything in response to the disclosures to WikiLeaks. I replied to the RFI and supplied three documents from a shared folder that I had created out of professional interest and for educating the workforce on the CALL Shared drive which referenced the WikiLeaks incident:

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- a. CAC Media Review 28 Apr 11.doc;
- b. 20100814 ALARACT 2452010 SENSITIVE INFOR-WIKILEAKs.txt; and
- c. 20100817 ALARACT 246_2010_Application of INFOSEC_Bolger.docx.

I supplied the above three documents to CPT Tooman as part of my response to his RFI.

- 5. On 10 October 2012, CPT Tooman sent me another email asking if CALL had produced anything in response to the disclosures by WikiLeaks since we had last spoke. I responded to him that I had no further knowledge of any WikiLeaks studies, analysis, or research in CALL at that time. I told CPT Tooman that if he wanted to query CALL about WikiLeaks, he may request that effort by contacting LTC Doug Willis, the CALL OPS and Plans Chief.
- 6. The following day, 11 October 2012, LTC Willis sent an email to me, CPT Tooman, and the other CALL team leaders. According to the email, LTC Willis confirmed with the other teams that CALL had not done anything related to WikiLeaks.
- 7. As of today, I am unaware of any order, request, or suggestion directly to me to study and recommend changes to training and doctrine regarding the handling of classified military information, the supervision of Soldiers handling classified military information, or any of the critical Army TTPs or vulnerabilities based upon the disclosure of information to WikiLeaks.
- 8. Although CALL is the center for the Army's lessons learned, each unit or major command has the ability to capture its own lessons learned without sharing that information with CALL. To my knowledge, CALL was not asked to perform a rapid adaption process in this case. If CALL was not asked to perform a rapid adaption process in this case, it may have been because either the information leaked did not warrant a rapid adaption response or the Army eliminated the need for a rapid adaption process by taking immediate steps to address any issues presented by the leaks. If a rapid adaption was not requested, CALL could have also completed a detailed case study. To my knowledge, CALL was not asked to complete a detailed case study on the leaks in this case either.

ANGEL M. OVERGAARD

CPT, JA

Assistant Trial Counsel

DAVID E. COOMBS

Civilian Defense Counsel

BRADLEY E. MANNING

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Accused